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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, P.A.,  
real party in interest acting on behalf of  
C. Itoh Middle East E.C. (Bahrain),**

**Plaintiff,**

**VS.**

**THE PEOPLE'S REPUBLIC OF CONGO  
and THE CONGOLESE REDEMPTION  
FUND**

**Defendant.**

**§ 87(2)(b)**

**CIVIL ACTION NO.** \_\_\_\_\_

**(State Court Case No. 04-10176-I)**

304 CV 2440R

**DEFENDANT CONGO REPUBLIC'S MOTION FOR LEAVE  
TO PROCEED WITHOUT LOCAL COUNSEL**

Defendant The People's Republic of Congo moves the Court pursuant to Local Rule 83.10(a) for leave to proceed without associating local counsel in this action. As shown by the accompanying brief in support of this motion, such leave should be granted because Defendant's counsel of record and his firm are qualified to appear without local assistance, the granting of this Motion will not result in delay, and there are no available local attorneys with sufficient background to represent Defendant's interest in this action.

WHEREFORE, Defendant requests that the Court grant Defendant leave to proceed in this action without the necessity of local counsel.

Respectfully submitted,



DONALD S. THOMAS, JR.  
State Bar No. 19880000  
CLARK, THOMAS & WINTERS  
P.O. Box 1148  
Austin, Texas 78767-1148  
(512) 472-8800  
(512) 474-1129 (fax)

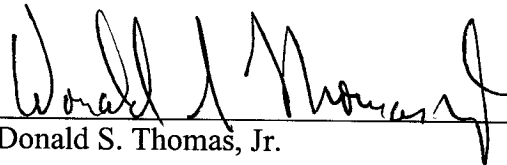
**ATTORNEY-IN-CHARGE FOR DEFENDANT,  
THE PEOPLE'S REPUBLIC OF CONGO**

OF COUNSEL:

BOAZ MORAG  
CLEARY, GOTTlieb, STEEN & HAMILTON  
One Liberty Plaza  
New York, New York 10006  
(212) 225-2060  
(212) 225-3999 (fax)  
(Motion to Appear Pro Hac Vice Forthcoming)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel for Plaintiff, Ernest E. Figari, Figari & Davenport, L.L.P., 3400 Bank of America Plaza, 901 Main Street, LB 125, Dallas, Texas 75202-3796, by federal express, on this 12<sup>th</sup> day of November, 2004.



Donald S. Thomas, Jr.